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11 CARLOS WRIGHT

12 UNITED STATES DISTRICT COURT

13 DISTRICT OF NEVADA

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 vs.

17 CARLOS WRIGHT,

18 Defendant.

CASE NO: 2:17-CR-0354-APG-EJY

**STIPULATION AND ORDER TO
CONTINUE SENTENCING**

(First Request)

19 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,
20 acting United States Attorney, and Edward Veronda, Assistant United States Attorney, counsel
21 for the United States of America, and Jennifer M. Waldo counsel for Carlos Wright that the
22 Sentencing date, currently scheduled for Wednesday, May 26, 2021 be vacated and set to a date
23 and time convenient to this Court, but no sooner than thirty (30) days.

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25 ////

1 The Stipulation is entered into for the following reasons:

- 2 1. That on May 17, 2021, a revised Presentence Investigation Report (PSR) was filed
3 in the instant matter, which modified the recommendation made by the United
4 States Probation Office;
- 5 2. That counsel for Mr. Wright needs additional time to review the revised PSR with
6 Mr. Wright and prepare any necessary objections, if any, to the revised PSR;
- 7 3. That defendant Wright is currently in custody in Tennessee, which makes
8 communicating with Mr. Wright more challenging;
- 9 4. That counsel for Mr. Wright also requires additional time to prepare and file any
10 Sentencing Memorandums in this matter;
- 11 5. That, as noted above, Mr. Wright is in custody in Tennessee, but it is counsel's
12 understanding that he has no objection to this request for a continuance;
- 13 6. That counsel for Mr. Wright has spoken to government counsel and the
14 government has no objection to this request for a continuance;
- 15 7. That counsel for the government will be out of the State from June 25, 2021 – June
16 30, 2021 and therefore, respectfully requests any new sentencing date not be set
17 during that timeframe;
- 18 8. That the additional time requested herein is not sought for purposes of delay, but
19 merely to allow counsel for the defendant sufficient time to effectively prepare for
20 sentencing; and
- 21 9. This is the first request to continue the sentencing in this matter.

22 DATED this 19th day of May, 2021.

23 CHRISTOPHER CHIOU
24 Acting United States Attorney

Waldo Law, LLC.

25 By: /s/ Edward Varonda
26 Counsel for USA

By: /s/ Jennifer M. Waldo
Counsel for Carlos Wright

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14 UNITED STATES OF AMERICA,

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CASE NO: 2:17-CR-0354-APG-EJY

**FINDINGS OF FACT, CONCLUSIONS OF
LAW AND ORDER**

FINDINGS OF FACT

- 21 1. That on May 17, 2021, a revised Presentence Investigation Report (PSR) was filed
22 in the instant matter, which modified the recommendation made by the United
23 States Probation Office;
- 24 2. That counsel for Mr. Wright needs additional time to review the revised PSR with
25 Mr. Wright and prepare any necessary objections, if any, to the revised PSR;
- 26 3. That defendant Wright is currently in custody in Tennessee, which makes
communicating with Mr. Wright more challenging;

4. That counsel for Mr. Wright also requires additional time to prepare and file any Sentencing Memorandums in this matter;
5. That, as noted above, Mr. Wright is in custody in Tennessee, but it is counsel's understanding that he has no objection to this request for a continuance;
6. That counsel for Mr. Wright has spoken to government counsel and the government has no objection to this request for a continuance;
7. That counsel for the government will be out of the State from June 25, 2021 – June 30, 2021 and therefore, respectfully requests any new sentencing date not be set during that timeframe;
8. That the additional time requested herein is not sought for purposes of delay, but merely to allow counsel for the defendant sufficient time to effectively prepare for sentencing; and
9. This is the first request to continue the sentencing in this matter.

CONCLUSIONS OF LAW

The ends of justice served by granting said continuance outweigh the best interests of the public and the defense in a proceeding with the sentencing hearing as currently scheduled.

ORDER

IT IS THEREFORE ORDERED that the sentencing date currently scheduled for May 26, 2021 at 3:00 p.m., be vacated and continued to the 30th day of June, 2021, at the hour of 1:00 p.m. in Courtroom 6C.

DATED AND DONE this 20th day of May, 2021.



UNITED STATES DISTRICT JUDGE